



DEPARTMENT OF THE NAVY

NAVAL SUPPORT ACTIVITY WASHINGTON
1411 PARSONS AVENUE SE, SUITE 340
WASHINGTON NAVY YARD DC 20374-5034

5090

Ser N4/557

December 9, 2016

Ms. Ingrid Hopkins
NPDES Enforcement Branch (3WP42)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103

Dear Ms. Hopkins:

SUBJECT: NOTIFICATION OF EXCEEDANCES WASHINGTON NAVY YARD (WNY),
NPDES PERMIT NUMBER DC0000141

Naval Support Activity (NSA) Washington is submitting this letter as the written Notification of Exceedances in accordance with the National Pollutant Discharge Elimination System (NPDES) permit number DC0000141. NSA Washington became aware of the exceedance on December 7, 2016 as a result of a routine monitoring event on 9 November 2016 for the monitoring period September 22 through November 21, 2016. In keeping with reporting requirements, NSA Washington contacted EPA NPDES Enforcement by phone on December 7, 2016 to report the exceedance. The written account is as follows:

- a. NPDES Outfall 008: A qualifying rain event occurred on the WNY on November 9, 2016. Samples were collected and analyzed in accordance with NPDES Permit DC0000141. A grab sample was taken at Outfall 008 and analyzed for Total Copper. The reported laboratory result was 154 µg/L. the permit limit is 114 µg/L.

After performing a preliminary investigation into the potential source of the copper, it is believed that new copper downspouts installed in 2014 within the drainage basin for NPDES Outfall 008 are the cause of the exceedance. The WNY is a historical significant site and must maintain appearance requirements. One aspect of these requirements is for external roof leaders to be copper. It was determined that these downspouts were not lined when they were installed and as a result, could potentially leach copper as stormwater comes into contact with the downspouts.

As noted in the Notification of Exceedances letter dated October 16, 2015, the duration of the exceedance appears to be intermittent and associated with larger but less frequent rain events. In examining

5090
Ser N4/557
December 9, 2016

the precipitation data for the month prior to the November 9 rain event, only one other significant rain event occurred 19 days prior to the November 9 event. During the 19 day timeframe, there were 3 instances where the WNY experiences minimal rainfall. This dry period with minimal rain, could have led to an accumulation of copper within the WNY stormwater sewer system, and during the larger event, flushed the copper to the outfall.

NSA Washington will continue to evaluate sampling data and site conditions to determine if further evaluation of sources needs to be conducted and if corrective actions need to be taken.

Any questions can be directed to my Stormwater Manager, Mr. Eric Ruffer at eric.ruffer@navy.mil or 202-433-7182.

Sincerely,



Durant S. Graves
Installation Environmental Program
Director
By direction of the Commanding Officer